

January 19, 2018

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Advanced Methods to Target and Eliminate Unlawful Robocalls*,
CG Docket No. 17-59.

Dear Ms. Dortch:

On January 17, 2018, Jeff Stalnaker, President and Founder, First Orion, Inc. (“First Orion”); Jennifer Glasgow, Executive Vice President, Policy and Compliance; John Ayers, Vice President, Corporate Development and undersigned counsel met with Chairman Pai and his Wireless Legal Advisor Rachael Bender to discuss First Orion’s efforts in developing tools that empower the wireline and wireless consumer to combat unwanted and illegal calls.

First Orion, a provider of call-identification and call blocking services and applications, supports the popular “ScamLikely” service that informs T-Mobile subscribers when an inbound call has a high likelihood of being placed for fraudulent purposes. First Orion noted during the meeting that it was the first call-identification provider to work with carrier partners to provide *in-network* call identification and blocking services.

Applying robust analytics, First Orion enables subscribers of its carrier partners, as well as consumers who directly download First Orion’s PrivacyStar mobile application onto their phones, to combat unlawful robocalls by determining the likelihood of a call being placed for fraudulent reasons. Because of the rise of spoofing and other techniques utilized by scammers, First Orion has also developed solutions to differentiate between “bad numbers” and “bad calls.” First Orion also provides consumers with a variety of “category tags,” including “Telemarketer,” “Political,” “NuisanceLikely,” “Survey,” etc., so that the customer can decide what calls to answer, and when and how to respond. Its consumer applications allow a user directly from the mobile screen to look up a calling number, block the caller, file a complaint with the Federal Trade Commission (a feature unique to First Orion), or add the number to the user’s approved and blocked list.

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Continuing to evolve its technology, First Orion has developed the CallerYD® application which informs consumers who is calling, and why, thereby adding transparency to the calling process. Using rich media such as the calling party's brand logo, CallerYD® also provides a number of interactive user response options.

Recognizing that companies have any number of legitimate reasons to reach consumers, First Orion also works with "call originators" to facilitate the delivery of wanted or legitimate calls, and provides a capability to monitor call originators' "reputation" among consumers. First Orion has created a free registry service, CallTransparency.com, that allows call originators to register their numbers, which are authenticated by First Orion. CallTransparency.com is an innovative industry effort that will better protect call originators as they place their legitimate calls.

Regarding the Further Notice of Proposed Rulemaking in the above-captioned proceeding, First Orion stressed the difference between call *blocking* and call *tagging*. While supportive of provider blocking as set forth in the Commission's November Order in the proceeding, and of consumer-directed blocking, First Orion emphasized the consumer benefits of tagging, where the call is *completed* with the added identification information, and the customer decides how to respond. Tagging provides the consumer with more tools to manage received calls than blocking does.

First Orion asked that the Commission avoid mandating a particular reporting process relative to progress on eliminating Robocalls. Noting that the industry is still in the early stages of innovation, the company urged that the Commission avoid mandating particular approaches, such as reliance on black and white lists, when more nuanced approaches are still evolving in the industry.

Rather, First Orion encouraged the Chairman to support voluntary adoption of industry best practices, and to give industry time to develop meaningful measures of success. For instance, an overly prescriptive reporting requirement on the number of false positives, implemented too soon, might not allow services providers to understand if an increase in the number of false positives resulted because algorithms had deteriorated for example, or because more consumers are being protected. Meanwhile, the Commission can play a leadership role in educating consumers on both legal and illegal spoofing and scams, and available options for combatting them.

Sincerely,



Patricia J. Paoletta
Counsel to First Orion

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Cc: Rachael Bender
Jay Schwarz
Louis Peraertz
Claude Aiken
April Jones
Erin McGrath
Amy Bender
Will Adams
Travis Litman
Umair Javed

Attachment: First Orion presentation reviewed during above-referenced the meeting



FIRST ORION

The ScamLikely guys



Me and Scam Likely decided to settle down. She's the only one who pays me any attention.



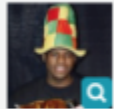
Feeling supes popular because I have like 15 missed calls from a Ms. Scam Likely.



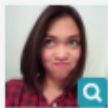
Always a good feeling when the phone rings and the caller ID reads: "Scam Likely." And they were right. It was.



I love how my phone rings and 'Scam Likely' comes up on the caller ID
[#scam](#) [#scamlikely](#) 📱👍



[@TMobile](#) deserves something for the scam likely function they implemented



Thanks [@TMobile](#). Scammer tried targeting my mom. Scam ID tagged the call as 'Scam Likely', so she didn't answer her phone.

a day ago





FIRST ORION

Continually
Innovate our
Technology and
Analytics

Work toward
Industry
Solutions

Collaborate
with Call
Originators

Our
Commitment

We want
consumers
to trust their
phone again.



This is complicated stuff

Need to continue the coordinated approach between government and industry.

Consumers need effective tools to manage both illegal and unwanted calls.

Headlines

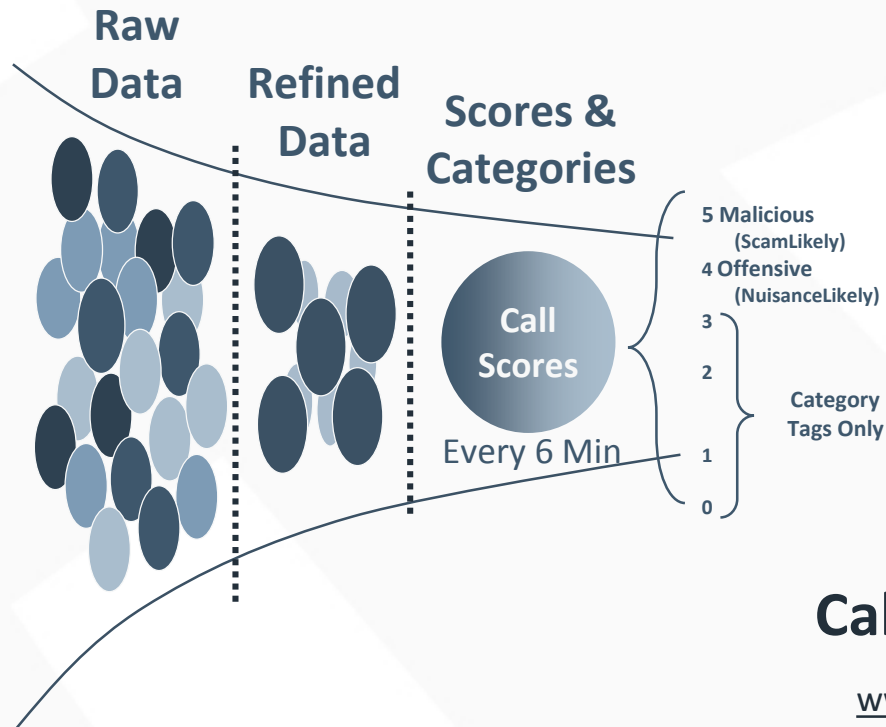
- Scammers are creative and keep evolving (e.g. neighborhood spoofing)
- Sophisticated data and analytics required
 - As leaders in the space, we are evolving from tagging phone numbers to tagging phone calls
- Consumers need protection in both wired and wireless world
- Stir/Shaken will help but is no silver bullet
- Tagging potential Scam and Fraud calls very successful with extremely few false positives
- Tagging with categories is also a critical first line of defense



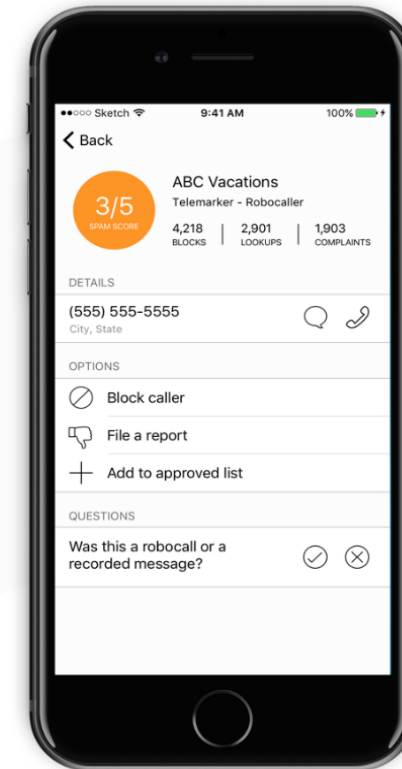
First In-Network Solution [Transparency = Knowledge = Empowered Consumers]

FONES collects and analyzes billions of disparate data points, distilling that data down into comprehensive and insightful consumable intelligence.

Real-time Analytics



Empowered Consumer



More Robust
CallerID with
Tagging

Reverse Lookup

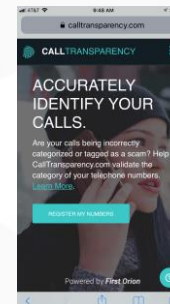
Block a Call
or Category

File a Report
(complaint
sent to FTC)

Call Originators Protected

www.calltransparency.com

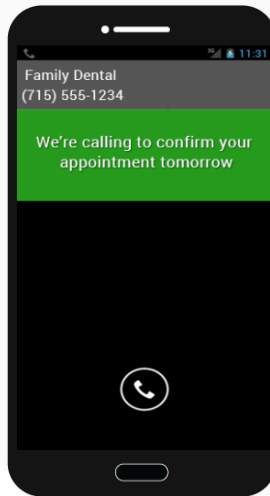
- Only for legitimate callers
- Register numbers, industry, reason for the call and callerID name
- Registry is free
- Preference Service (fee)



CallerYD® ALLOWS CONSUMERS TO KNOW WHO IS CALLING AND WHY

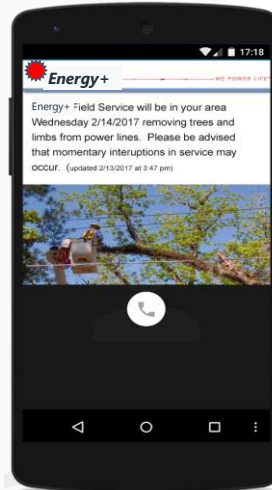
CallerYD® is a revolutionary product protecting consumers from unwanted calls through unique engagement and providing callers with branded personalized calling solutions

Text Only



Incoming call screen with caller ID info and call purpose

Informative



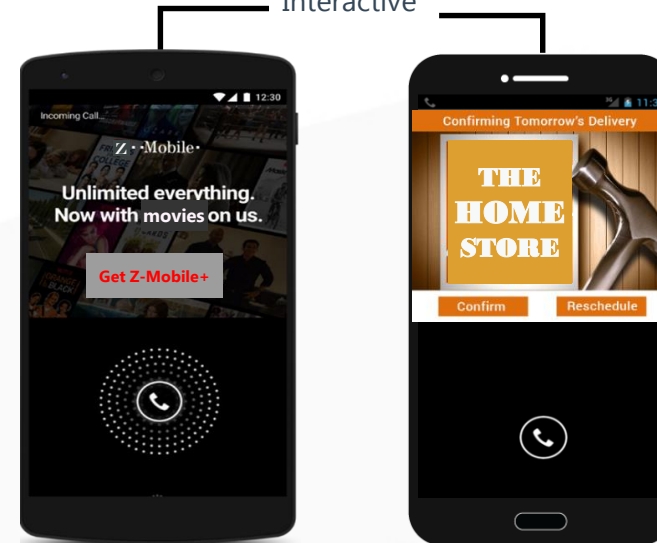
Incoming call screen with caller ID info and call purpose. Informational only with no need to respond

Informative



Incoming call screen with caller ID info and purpose plus rich media such as image, brand, video etc.

Interactive



Incoming call screen with caller ID info, rich media and interactive user response options

CallerYD®'s nimble interface allows callers to curate exactly the type of presentation that they want to each user—from text only to predictive and media rich, interactive views



How the FCC can help

Encourage and support adoption of industry best practices.

Avoid regulations that encourage too much reliance on white/black lists.

Recognize similarities and differences between call blocking and tagging.

Government and Industry Collaboration

- Encourage the industry to use voluntary call tagging to give consumers more information for making decisions about how to handle calls they receive.
- Give industry some time to identify meaningful measures of progress (reporting) on industry success and related issues.
- Expand efforts to work with industry to develop consumer education about both legal and illegal spoofing and scams.

